

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, et al.,	§	
	§	
Plaintiffs,	§	
	§	
VS.	§	CASE NO. 1:14-CV-00254
	§	(The Hon. Andrew S. Hanen)
	§	
UNITED STATES OF AMERICA,	§	
et al.,	§	
	§	
Defendants.	§	

**MOTION FOR LEAVE TO PARTICIPATE AS AMICUS CURIAE IN
OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY
INJUNCTION BY CONGRESSMAN FILEMON VELA**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Congressman Filemon Vela in his official capacity as a member of Congress and through his counsel Tony Martinez and Jaime Díez and files this motion for leave to participate as Amicus Curiae and file a brief in Opposition to Plaintiffs' Motion for Preliminary Injunction. The proposed brief is filed as an attachment to this motion.

Movant, Congressman Filemon Vela, served as a member of the 113th Congress and represents a district anchored along the U.S.-Mexico Border—in Brownsville, Texas during which time he served on the Homeland Security Committee and was co-chair of the Congressional Border Caucus.

Movant will continue to serve in the 114th Congress, which convenes on January 6, 2015. During the 113th Congress, Movant was focused on immigration issues and will continue to be in the 114th Congress.

Movant respectfully requests this Court grant this motion, and allow him to participate as an Amicus Curiae, and accept for filing the amicus curiae brief submitted with this motion.

Respectfully submitted,

/s/ Tony Martinez
Martinez Barrera & Martinez
Texas Bar No. 13139000
Federal Bar No. 62383
1201 East Van Buren Street
Brownsville, TX 78520

-and-

Jaime M. Diez
Jones & Crane
Texas Bar No. 00783966
Federal Bar No: 23118
P.O. Box 3070
Brownsville, TX 78523
Telephone: (956) 544-3565
JaimeMDiez@aol.com

Counsel for amicus curiae

CERTIFICATE OF CONFERENCE

We, Tony Martinez and Trey Martinez of Martinez, Barrera y Martinez, certify that we consulted with Lead Attorney Andrew Stephen Oldham as to whether he would or would not oppose this motion. Mr. Oldham has stated that he is unopposed.

Signed this 6th day of January, 2015.

/s/ Tony Martinez

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2015, a copy of the foregoing Motion for Leave to Participate as Amicus Curiae and file a brief in Opposition to Plaintiffs' Motion for Preliminary Injunction was filed using the Court's electronic filing system, and a copy was automatically transmitted to counsel for Plaintiffs and Defendants by the Court's ECF electronic mail service.

/s/ Tony Martinez